

EXHIBIT I

Guerrier, Pascale

From: Waxman, Daphna A.
Sent: Sunday, August 8, 2021 2:15 PM
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Cc: Tenreiro, Jorge; Daniels, Jon; Moye, Robert M.; Hanauer, Benjamin J.; Stewart, Ladan F;
Guerrier, Pascale; Sylvester, Mark
Subject: SEC v Ripple; August 5 Meet and Confer

Counsel:

I'm writing to memorialize and follow up on certain discussions between the parties during the August 5 meet and confer.

As requested during the August 5 meet and confer, please confirm whether Ripple has collected, searched and/or produced the following:

1. Recordings (video or audio) of internal Ripple meetings, including, but not limited to, recordings of the Ripple "All Hands" meeting.
2. Documents and communications memorializing XRP trading restrictions imposed by management pursuant to Ripple's code of conduct ahead of any Ripple public announcement.
3. Notes prepared by Ripple employees, including, but not limited to, notes prepared by Mr. Zagone related to meetings with regulators.
4. Notes, documents, recordings or any other information accessible by Ripple employees on Ripple's Confluence system, including, but not limited to, XRP Working Group meeting notes. *See e.g.* RPLI_SEC 376463.

As discussed during the August 5 meet and confer, Ms. O'Gorman referenced categories 1 and 2 and Mr. Zagone referenced category 3 during their respective depositions on August 4 and July 20. The document bearing bates RPLI_SEC 0864073-74 references Mr. Zagone's notes as being saved and organized on Ripple's Confluence system.

As requested during the August 5 meet and confer, please also confirm whether Ripple will produce external communications between Ripple's General Counsel Ms. Brynly Llyr and digital asset platforms, which Ms. O'Gorman also referenced during her August 4 deposition.

Given that discovery is set to end in 23 days, we request that Ripple provide responses to the above by Monday.

Thank you,
Daphna